

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

-against-

RIPPLE LABS INC., BRADLEY  
GARLINGHOUSE, and CHRISTIAN A.  
LARSEN,

Defendants.

20 Civ. 10832 (AT) (SN)

**DECLARATION OF MATTHEW C. SOLOMON**

I, Matthew C. Solomon, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746 that the following is true and correct:

1. I am an attorney admitted to practice before this Court *pro hac vice* and a partner at the law firm Cleary Gottlieb Steen & Hamilton LLP, and I am counsel to Defendant Bradley Garlinghouse in the above captioned action.

2. I respectfully submit this declaration to accompany Mr. Garlinghouse's Reply Memorandum in support of his Motion to Dismiss the Amended Complaint.

3. Attached hereto as Exhibit K<sup>1</sup> is a true and correct copy of a March 11, 2017 email chain that is Bates-stamped SEC-LIT-EPROD-000502078. This email chain was quoted in and thereby incorporated into the Amended Complaint (ECF No. 46) by reference at paragraph 407. This email chain was quoted in Plaintiff Securities and Exchange Commission's Memorandum

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<sup>1</sup> The exhibit lettering in this declaration is a continuation from the Declaration of Matthew C. Solomon submitted in support of Mr. Garlinghouse's Motion to Dismiss the Amended Complaint (ECF No. 114).

of Law in Opposition to Defendants Christian A. Larsen's and Bradley Garlinghouse's Motions to Dismiss (ECF No. 183) (the "Opposition") at pages 13 and 30.

4. Attached hereto as Exhibit L is a true and correct copy of a July 23, 2018 email that is Bates-stamped SEC-LIT-EPROD-000103219. This email was quoted in and thereby incorporated into the Amended Complaint by reference at paragraph 420. This email was quoted in the Opposition at pages 15 and 30.

5. Attached hereto as Exhibit M is a true and correct copy of an April 17, 2017 email chain that is Bates-stamped SEC-LIT-EPROD-000502060. This email chain was quoted in and thereby incorporated into the Amended Complaint by reference at paragraph 408. This email chain was quoted in the Opposition at pages 13 and 30-31.

Executed on June 4, 2021 in Washington, DC.

Respectfully submitted,

/s/ Matthew C. Solomon

Matthew C. Solomon